

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LADIES PROFESSIONAL GOLF
ASSOCIATION,

Civil Action No.: 1:25-cv-02493-ALC

Plaintiff,

-against-

JOONGANG ILBO CO., LTD.,

Defendant.
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**DECLARATION OF JOSEPH M. DEFAZIO IN SUPPORT OF LETTER MOTION
SEEKING PRE-MOTION CONFERENCE FOR MOTION TO SEAL EXHIBITS**

JOSEPH M. DEFAZIO hereby declares as follows:

1. I am a partner at Troutman Pepper Locke LLP, counsel of record for defendant JoongAng Ilbo Co., Ltd. I am duly admitted to the United States District Court for the Southern District of New York.
2. I submit this Declaration in support of letter motion seeking pre-motion conference for motion to seal exhibits attached to the Declaration of Jinhee Kim in Support of JoongAng's Motion to Dismiss or Stay ("Kim Declaration").
3. The International Broadcast Distribution Agreement referenced by Plaintiff at ¶ 2 of the Complaint, is attached as **Exhibit A** to the Kim Declaration.
4. The Tournament Sponsorship Support Agreement referenced by Plaintiff at ¶ 2 of the Complaint, attached as **Exhibit B** to the Kim Declaration.
5. Request for Arbitration dated April 10, 2025 submitted by JTBC Discovery Inc. against the LPGA in an arbitration before the International Chamber of Commerce attached as **Exhibit C** to the Kim Declaration.

6. Answer to Request for Arbitration of JTBC Discovery Inc. and Counterclaims submitted by the LPGA in the Arbitration, attached as **Exhibit D** to the Kim Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 18th day of June 2025, New York, New York

s/ Joseph DeFazio
JOSEPH M. DEFAZIO